

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Thaddeus R. Maciag, Esq.
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Attorney for the Debtor-in-Possession

In re:

Mark Anthony Andreottis II,

Debtor-in-Possession .

Case No.: 17-15603-JKS

Chapter 13

Judge: Hon. John K. Sherwood

Hearing Date: 10/31/2017, 10:00am

**DEBTORS' RESPONSE
TO
U.S. TRUSTEE'S SHORT-NOTICE MOTION TO CONVERT OR DISMISS**

Thaddeus R. Maciag, of full age, certifies and says:

1. I am attorney for the Debtor-in-Possession in the within matter, and as such am familiar with the facts of this Certification.
2. I here file this Certification on behalf of the Debtor, in response to the short-notice Motion to Convert or Dismiss filed by the Office of United States Trustee.
3. In telephone calls to me from his present place of incarceration, the Debtor has asked me to convey to this Court that he now has a bail hearing on for November 1, 2017 and that, if released on bail, he is 100% confident that he can complete all outstanding Monthly Operating Reports, and get all missing Tax Returns completed and filed, within seven to ten days.

4. The Debtor accordingly asks that the U.S. Trustee's Motion to Convert or Dismiss either be denied, or be continued to a subsequent date 7 to 14 days later, or in the alternative that the effective date of any Order to Convert or Order to Dismiss be stayed until after the result of the Debtor's November 1, 2017 hearing is known and then, if he is indeed released on bail pending his January 2018 sentencing or until his criminal conviction appeals are concluded, that the convert or dismiss hearing be re-calendared upon is being granted bail.

Respectfully submitted,

MACIAG LAW, LLC

/s/ Thaddeus R. Maciag

Thaddeus R. Maciag, Esq.

Attorney for the Debtor-in-Possession

Date: October 30, 2017